

Colorado Stormwater Council

Phase II Listening Session

April 17, 2013

CDPHE



www.coloradostormwatercouncil.org

Overview

- * Who is the Colorado Stormwater Council
- * Overarching concerns with current permit rewrite process
- * Specific minimum control measures
- * Suggested Next Steps

Colorado Stormwater Council (CSC)

- * CSC represents 98% of the Permitted Phase I and IIs MS4s
- * Working together benefits surface water quality
- * Create a better understanding with the Division on specific implementation requirements

Overarching Concerns

- * Data supporting rewrite of permit
- * Collaboration with MS4 Permit Holders
- * One size does not fit all
- * Transparency

Data supporting rewrite of permit

- * Focus has been on making permit more auditable
- * Phase II MS4 audits and Targeted Permit Questionnaire
- * General concepts – without defined problem that is being solved

Collaboration with MS4 Permit Holders

- * Communication
- * Not addressing requested issues
- * Efficient use of time

One size doesn't fit all

Current program documents are working:
Provide needed flexibility

- * Adding administrative tasks and specificity does not necessarily equate to improving water quality

Transparency - Monitoring

- * Phase I Dry weather monitoring requirement removed because ineffective
- * Departure from Current Permit Language
- * TMDL
- * Lack of analysis of Phase I monitoring data

Minimum Control Measures

General Issues for all Program Areas

- * What specific problem with current Permit language is resulting in water quality impacts?
- * What specific problems with current Permit language does not allow enforcement?
- * What analysis of the Phase II audits and questionnaires show systemic findings that result in water quality impacts?

Minimum Control Measure #s 1 and 2

Public Education / Involvement

Successful Process of Collaboration

- * Proposal
- * Feedback
- * Revisions
- * Collaborative Discussions

Minimum Measure #3

Illicit Discharge Detection and Elimination

- * Elimination of occasional incidental non-stormwater discharges
- * Record keeping
- * Enforcement escalation

Minimum Measure #4

Construction

- * Difficult program and the one that can achieve the biggest benefit
- * Need flexibility
- * Best use of limited resources, webpage?

Minimum Measure #5

Post Construction

Minimal Discussion

Minimum Measure #6

Pollution Prevention/Good Housekeeping Municipal Operations

- * Facility Run-off Control Plans vs. One Time Operating Procedures Report to the Division
March 2010
- * Mixing Permit requirements

Next Steps

Proposed Process

1. Identify problem that has a potential water quality impairment
2. Propose solution or request assistance to develop solution
3. Effective collaboration to finalize proposed permit language

Thank You



www.coloradostormwatercouncil.org